

EXHIBIT P

From: Tricia L Roland
 Date: July 13, 2017 10:35:00 AM (-07)
 To: Jennifer J. Petritz
 Cc: Jaffe, Darcy (email);Kathy M. Hare;Kelly J. Paananen;Tricia Roland
 Subject: **Stroke Center MB modified schedule.**

Attachments: Re Your return to work on 7 3.msg; MB and clinic on 7 11.msg; clinic updated with totals.xlsx; MB modified schedule.pptx;

Hello Jennifer,

As per our phone conversation I am attaching my justification behind the modified schedule that was proposed for Mattie along with some email exchanges.

Once I found out about Mattie's need for accommodation I went to Kelly to have a conversation to see what would be the best options for meeting the needs of the department and accommodating Mattie.

We have had ongoing issues with Mattie working overtime due to not appropriately managing her time and going into unauthorized over time during her Friday clinic at the end of her 80 hours. Taking that into account and wanting to ensure we accommodate her FMLA I thought it would be best to anticipate not having patients scheduled automatically on Friday and once she was back and settled in if she was feeling like she could handle 3 patients on Friday Dr. Tirschwell and I would determine which patients were the highest priority to be seen. Dr. Tirschwell and I agreed on this plan and he was actively involved in reviewing the schedule prior to me sending to Mattie to make sure we were meeting the needs of the department. We are far surpassing our time frame for having stroke patients seen 2-3 weeks post D/C. One four hour clinic is equal to .1 FTE. Due to the lack of ARNP coverage in the stroke clinic we have had to re-schedule multiple patients. The inpatient ARNP's (Anna Krumpe, MaryLou Willis and Lynne Smith) have been kind enough to help us out when there schedule permits. They have given us specific days where they can see patients. They had previously agreed to see 6 patients on Friday July 7th and Tuesday July 11th (both of these days were booked with 6 patients) once we heard of Mattie's return we decided it only fair to have Mattie see these patients as the inpatient ARNP's were seeing patients in stroke clinic in addition to their other full time work. I'm attaching for you an excel which lists the number of patients Mattie saw/week divided by Tuesday/Friday clinic. I would call your attention to column D and G. These were the total number of patients booked for a specific day. As you can see it was pretty typical for Mattie to have anywhere between 8-12 patients booked per week. Those weeks where it was less than that was usually related to patients calling and cancelling ahead of time. The column marked "red" is patients that did not show. As you can see by row 48 while we frequently had between 8-12 patients booked per week in reality on average she was only seeing around 3 on Tuesday and 3 on Friday. This goes along with our high no show rate (one of the highest among the clinic). Taking all this into account it seemed more than reasonable to book 6 patients on Tuesdays. If Mattie attended rounds on Monday/Wednesdays and case conference on Fridays as detailed in her schedule we felt this would give her prep time to know the patients and any pertinent issues that arose. She then had additional time built into Wednesday's schedule for completion of documentation. It's also worth mentioning that at any point Mattie could have and should have communicated with me any concerns and problem solve around her schedule. She did not do this and lately has ignored all my communications making it extremely difficult to meet the needs of our patients and problem solve anything. Mattie has expressed concerns regarding patients getting roomed late. I reached out to Crystal Kelly the stroke clinic nurse manager to understand what led to Mattie leaving at 7pm on Tuesday. Crystal sounded frustrated. They have had to knock on the door when Mattie is seeing patients to see when she plans on finishing as she takes a long time in rooms. Crystal stated for patient satisfaction reasons they don't room patients until Mattie is ready to see them since she always runs late and the lobby is a more comfortable waiting area and describes the chairs in the rooms as too hard for the patients. The nurse that was here on Tuesday was supposed to leave at 5pm and had to stay until 7pm due to Mattie's poor time management. Crystal is documenting the clinic issues.

While there is a great deal of work that needs to be done in the clinic re workflow and efficiency I don't think what occurred Tuesday was related to late rooming. I've attached some time stamps of charts from Tuesday for your review.

Please do not hesitate to reach out to me if you have additional questions.

Thank you,

Tricia

Tricia L. Roland, MPH, BSN, RN

Stroke Program Manager

Harborview Medical Center

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From: Tricia Roland
Date: June 30, 2017 9:34:18 PM (-07)
To: mjeanty@u.washington.edu
Cc: Marthilde Brzycki;Nola Balch;Kathy M Hare;Kelly J. Paananen
Subject: **Re: Your return to work on 7/3**

Attachments:

Hello Mattie,

The schedule/workflow detailed for the period of your reduced work schedule accommodation meets the needs of our unit and is reasonable. I worked hard to establish a plan that is workable and aligns both with the expectations detailed in your action plan from April and the parameters for a reduced work schedule defined by your health care provider.

This schedule/workflow is not up for negotiation, though as ever, if you run into challenges in meeting the work expectations you should come to me right away so that we can engage in a problem solving discussion to review workflow, priorities and strategies.

You certainly should take your 15 minutes breaks each shift, please do so. As you know, these will be one 15 minute break on each 5 hour shift and two 15 minute breaks and a 30min lunch on the one scheduled 8 hour shift.

Lastly, as you see on the schedule, I have scheduled one meeting between yourself, Kelly and I, to touch base after your extended absence. To be clear, you should expect to meet with me or any other member of the leadership team as a regular part of your duties, as would any employee at HMC. While you are welcome to have union representation at an investigatory interview, a corrective action meeting or grievance meeting; you are not entitled to union representation as a part of routine departmental discussions. Should you have questions about this, please contact your union representative for clarification.

I will see you Monday morning Mattie. Have a good weekend.

Tricia

Tricia L. Roland, MPH, BSN, RN
Stroke Program Manager

On Jun 30, 2017, at 7:28 PM, mjeanty@u.washington.edu wrote:

Hi Tricia,

Friday 7/7 is 8 hours - I am allowed by law to have a 30 minute lunch period and 15 minute breaks - which you left out.

My notes have been completed in a timely manner per hospital policy since hired with 100% compliance for billing prior to you changing my workflow.

My regular workflow was 5 patients on Tuesdays - and I requested 5 patients to be added on Fridays (total 10 patients) -completing some of my notes and follow-ups the next workday.

In your new workflow, you mentioned 3 cases on Fridays and 6 cases on Tuesdays - total 9 patients. As I have mentioned to you and Kelly on multiple occasions, the patients do not show up exactly at their appointment time or roomed at the exact scheduled time.

Unfortunately, I cannot handle working part-time and seeing 6 patient on a clinic day; which is more than my usual load at this time. And based on your workflow, I will not have prep time for Tuesdays clinic. I will no longer be able to add any add-ons like I used to on my clinic days - due to the schedule restrictions and recent disruption to my workflow.

I can see 3-4 patients on Tuesdays and 2-3 patients on Fridays - giving me time to go to didactics and conference. That is close to evenly distributed and is 7 out of my usual 10 patients.

I would like advance warning prior to any meeting with you and Kelly. I need my union representative present during any private meeting with you, Kelly, and any other member of management.

Thank you,
Marthilde

On Fri, 30 Jun 2017, Tricia L Roland wrote:

David is right they were attached but I've included again.

Tricia

Tricia L. Roland, MPH, BSN, RN

Stroke Program Manager

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-----Original Message-----

From: David L. Tirschwell [<mailto:tirsch@uw.edu>]

Sent: Friday, June 30, 2017 5:48 PM

To: Marthilde Brzycki

Cc: Tricia Roland; Marthilde Brzycki; KIM FRANCIS; Nola Balch; Kathy M Hare;

Kelly J. Paananen

Subject: Re: Your return to work on 7/3

There was an attachment to the email, i saw them

Thank you

=====

David Tirschwell, MD

Harborview Neurology and

UW Medicine Comprehensive Stroke Center

On Jun 30, 2017, at 5:46 PM,
"mjeanty@u.washington.edu"

<mjeanty@u.washington.edu> wrote:

Hello,

Where are the slides?

On Fri, 30 Jun 2017, Tricia L Roland wrote:

Mattie,

I was made aware by Kim Francis that you plan to return to work on

Monday. I have attached a schedule that works best to fit the needs

of the department as well as accommodates your FMLA request.

You can see in the attachment there are two slides. Slide 1 is your

schedule from Monday 7/3 - Monday 7/10. I needed to make adjustments

due to Friday clinic being booked and the July 4th holiday. Slide 2

represents your schedule from 7/11 on until your FMLA is either

completed or reevaluated on 9/1/17.

Please keep in mind this is subject to change should the needs of the

department change but if any changes need to be made I will give you

ample notice.

I'm glad we were able to make this work. Should you have any

questions please do not hesitate to reach out, otherwise I will plan

to see you in the office on Monday.

Tricia

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Stroke Program Manager

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From: Tricia L Roland
 Date: July 12, 2017 8:14:00 AM (-07)
 To: Nola Balch
 Cc: Kelly Paananen; Kathy M. Hare
 Subject: **MB and clinic on 7/11**

Attachments:

Below are screen shots from Patients Mattie saw in clinic yesterday. Five of the six patients had "unable to write notes due to time constraints" in the patients chart. None of her notes were completed. Patients were booked at 12, 1, 1:45, 2:30, 3:15, and 4 pm. Mattie was clocked in from 1134-1858. At no point did she communicate with me that she would need to work extra hours nor was it communicated that she was having difficulty completing her work in a timely fashion. This morning she forwarded me an email sent to Dr. Tirschwell that she apparently has an appointment today that was booked over one month ago. She did not address me at all in the email she just forwarded what she wrote to Dr. Tirschwell.

Patient #1

Patient Events Log - Last Refresh Time: 07/12/2017 07:56:34

Event History				
Date/Time	Event	Department	User	Comments
07/11/2017 11:43:51	Department check-in sta...	HMC STROKE CLI...	Mills, Eliza...	
07/11/2017 11:44:24	Department check-in co...	HMC STROKE CLI...	Mills, Eliza...	
07/11/2017 12:00:47	Start Rooming	HMC STROKE CLI...	Johnson, D...	
07/11/2017 12:03:27	Done Rooming	HMC STROKE CLI...	Brzycki, M...	
07/11/2017 12:03:27	Start Visit	HMC STROKE CLI...	Brzycki, M...	
07/11/2017 13:04:52	Visit Complete	HMC STROKE CLI...	Brzycki, M...	

Patient #2

Date/Time	Event	Department	User	Comments
07/11/2017 12:08:23	Department check-in sta...	HMC STROKE CLI...	Middleton, ...	
07/11/2017 12:09:09	Department check-in co...	HMC STROKE CLI...	Middleton, ...	
07/11/2017 13:13:17	Start Rooming	HMC STROKE CLI...	Johnson, D...	
07/11/2017 13:26:46	Done Rooming	HMC STROKE CLI...	Brzycki, M...	
07/11/2017 13:26:46	Start Visit	HMC STROKE CLI...	Brzycki, M...	
07/11/2017 14:27:43	Visit Complete	HMC STROKE CLI...	Brzycki, M...	

PAST MEDICAL HISTORY: ***

LABS: ***

IMAGING: ***

PHYSICAL EXAMINATION:

VITAL SIGNS: BP (I) 148/92 | Pulse 73 | Temp 98.1 °F (36.7 °C) (Tympanic) | Resp 16 | Ht 5' 9" (1.753 m) | Wt 203 lb 11.2 oz (92.4 kg) | SpO2 97% | BMI 30.08 kg/m²

GENERAL APPEARANCE: ***

CURRENT STATUS: Patient is alert oriented an neurologically stable this visit.

UNABLE TO WRITE NOTES DUE TO TIME

Conversation: New Patient

Patient #3

Patient Events Log - Last Refresh Time: 07/12/2017 07:58:10

Event History				
Date/Time	Event	Department	User	Comments
07/11/2017 12:59:13	Department check-in sta...	HMC STROKE CLI...	Middleton, ...	
07/11/2017 12:59:49	Department check-in co...	HMC STROKE CLI...	Middleton, ...	
07/11/2017 13:52:23	Start Rooming	HMC STROKE CLI...	Johnson, D...	
07/11/2017 15:34:12	Done Rooming	HMC STROKE CLI...	Brzycki, M...	
07/11/2017 15:34:12	Start Visit	HMC STROKE CLI...	Brzycki, M...	
07/11/2017 16:05:55	Visit Complete	HMC STROKE CLI...	Johnson, D...	

New Patient
Stroke
Reason for Visit History

TIA (transient ischaemic attack) - Primary

Progress Notes

Progress Notes by Brzycki, Marthilde, ARNP at 7/11/2017 1:45 PM

Author: Brzycki, Marthilde, ARNP
Note Status: Sign at close encounter
Editor: Brzycki, Marthilde, ARNP (Nurse Practitioner)

Author Type:
Cosign:

Nurse Practitioner
Cosign Not Required

Filed:
Encounter Date:

UNABLE TO FINISH NOTES DUE TO TIME CONSTRAINT

CHIEF COMPLAINT:

Patient presents in Stroke Clinic for follow up ***

HISTORY OF PRESENT ILLNESS:

[REDACTED] (left right both:107788) handed female ***

PAST MEDICAL HISTORY: ***

LABS: ***

IMAGING: ***

PHYSICAL EXAMINATION:

VITAL SIGNS: BP 133/62 | Pulse 81 | Temp 98.1 °F (36.7 °C) (Tympanic) | Resp 16 | Ht 5' 6.5" (1.689 m) | Wt 150 lb 3.2 oz (68.1 kg) | SpO2 98% | BMI 23.88 kg/m²

GENERAL APPEARANCE: ***

Patient #4

Patient Events Log - Last Refresh Time: 07/12/2017 07:58:58

Event History

Date/Time ▲	Event	Department	User	Comments
07/11/2017 13:58:02	Department check-in sta...	HMC STROKE CLI...	Middleton, ...	
07/11/2017 13:59:10	Department check-in co...	HMC STROKE CLI...	Middleton, ...	
07/11/2017 15:00:35	Start Rooming	HMC STROKE CLI...	Johnson, D...	
07/11/2017 16:11:26	Done Rooming	HMC STROKE CLI...	Brzycki, M...	
07/11/2017 16:11:26	Start Visit	HMC STROKE CLI...	Brzycki, M...	
07/11/2017 16:59:39	Visit Complete	HMC STROKE CLI...	Greig, Elain...	

Progress Notes

Progress Notes by Brzycki, Marthilde, ARNP at 7/11/2017 2:30 PM

Author: Brzycki, Marthilde, ARNP
Note Status: Sign at close encounter
Editor: Brzycki, Marthilde, ARNP (Nurse Practitioner)

Author Type:
Cosign:

Nurse Practitioner
Cosign Not Required

UNABLE TO WRITE PROGRESS NOTES TODAY DUE TO TIME.

CHIEF COMPLAINT:

Patient presents in Stroke Clinic for follow up: Bilateral ischemic strokes ***

HISTORY OF PRESENT ILLNESS:

[REDACTED] (left right both:107788) handed male ***

PAST MEDICAL HISTORY: ***

LABS: ***

IMAGING: ***

Patient #5

Patient Events Log - Last Refresh Time: 07/12/2017 07:59:50

Event History

Date/Time ▲	Event	Department	User	Comments
07/11/2017 14:32:13	Department check-in sta...	HMC STROKE CLI...	Mills, Eliza...	
07/11/2017 14:33:21	Department check-in co...	HMC STROKE CLI...	Mills, Eliza...	
07/11/2017 15:31:04	Start Rooming	HMC STROKE CLI...	Johnson, D...	
07/11/2017 17:06:47	Done Rooming	HMC STROKE CLI...	Brzycki, M...	
07/11/2017 17:06:47	Start Visit	HMC STROKE CLI...	Brzycki, M...	
07/11/2017 17:30:21	Visit Complete	HMC STROKE CLI...	Brzycki, M...	

Patient presents in Stroke Clinic for follow up ***

HISTORY OF PRESENT ILLNESS:

[REDACTED] (left right both:107788) handed male ***

PAST MEDICAL HISTORY: ***

LABS: ***

IMAGING: ***

PHYSICAL EXAMINATION:

VITAL SIGNS: BP 130/72 | Pulse 65 | Temp 98.1 °F (36.7 °C) (Tympanic) | Resp 16 | Ht 5' 8" (1.727 m) | Wt 168 lb 6.4 oz (76.4 kg) | BMI 25.61 kg/m²

GENERAL APPEARANCE ***

CURRENT STATUS: Patient is neurologically stable.

He has followed up with speech, PT/OT. Taking eliquis without issues.

UNABLE TO WRITE PROGRESS NOTE DUE TO TIME.

Conversation: New Patient

July 11, 2017

Patient #6

Patient Events Log - Last Refresh Time: 07/12/2017 08:01:03

Event History

Date/Time	Event	Department	User	Comments
07/11/2017 15:13:18	Department check-in sta...	HMC STROKE CLI...	Middleton, ...	
07/11/2017 15:13:59	Department check-in co...	HMC STROKE CLI...	Middleton, ...	
07/11/2017 16:12:36	Start Rooming	HMC STROKE CLI...	Johnson, D...	
07/11/2017 17:44:03	Done Rooming	HMC STROKE CLI...	Brzycki, M...	
07/11/2017 17:44:03	Start Visit	HMC STROKE CLI...	Brzycki, M...	
07/11/2017 18:31:09	Visit Complete	HMC STROKE CLI...	Brzycki, M...	

Progress Notes

Progress Notes by Brzycki, Marthilde, ARNP at 7/11/2017 4:00 PM

Author:	Brzycki, Marthilde, ARNP	Author Type:	Nurse Practitioner
Note Status:	Sign at close encounter	Cosign:	Cosign Not Required
Editor:	Brzycki, Marthilde, ARNP (Nurse Practitioner)		

UNABLE TO WRITE PROGRESS NOTE DUE TO TIME

CHIEF COMPLAINT:

Patient presents in Stroke Clinic for follow up ***

HISTORY OF PRESENT ILLNESS:

[REDACTED] (left right both:107788) handed male ***

PAST MEDICAL HISTORY: ***

LABS: ***

IMAGING: ***

PHYSICAL EXAMINATION:

Tricia

Tricia L. Roland, MPH, BSN, RN
Stroke Program Manager

Harborview Medical Center
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Mailbox 359775 | 3CT-79.1
Phone (206) 744-2403 | Fax (206) 744-3976
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	Tuesday		Tuesday Totals Booked		Friday		Fridayy Totals Booked	
	Green/blue	Red			Green/Blue	Red		
7/1/2016						2		2
7/5/2016	2	1			3			
7/8/2016						4		4
7/12/2016	4	2			6			
7/15/2016						3	1	4
7/19/2016	4				4			
7/22/2016						3		3
7/26/2016	1				1			
7/29/2016						5		5
8/2/2016	5				5			
8/5/2016						4	1	5
8/9/2016	2	1			3			
8/12/2016						2	2	4
8/16/2016	3	1			4			
8/19/2016						5		5
8/23/2016	5				5			
8/26/2016						2	1	3
8/30/2016	2	3			5			
9/2/2016						3	1	4
9/6/2016								
9/9/2016						3	1	4
9/13/2016	4	1			5			
9/16/2016						2		2
9/20/2016	4				4			
9/23/2016						3	1	4
9/27/2016	5				3			
9/30/2016						2	3	5
10/4/2016								
10/7/2016						3	2	5
10/11/2016	3	2			5			
10/14/2016						1		1
10/18/2016	5	1			6			
10/21/2016						5		5
10/25/2016	2	2			4			
10/28/2016						2	2	4
11/1/2016	5				5			
11/4/2016						4	1	5
11/8/2016	4	2			6			
11/10/2016	2				2			
11/15/2016	1	4			5			
11/17/2016						2		2
11/18/2016						2	2	4
11/22/2016	2	3			5			
11/29/2016	2	2			4			
12/2/2016						4		
Average	3.19047619				2.952380952			

First week back

	Monday 7/3	Tuesday 7/4	Wednesday 7/5	Thursday 7/6	Friday 7/7
7/3/17-7/8/17	7:30-9:30 Rounds 9:30-12:30 -MD inbasket (test results, Pt questions, FMLA, email catch up)	Holiday	7:30-9:00 Rounds 9:00-10:00 Meet with Kelly and Tricia 10:00-12:30 clinic prep email catch up	Off	Clinic 8:30-5 -9:00 -9:45 -10:30 -11:15 -12:00 -12:45 Lunch 1:30-2 2:30-4:30 Friday Case Conference
	5	8	5	0	8
	Monday 7/10	Tuesday	Wednesday	Thursday	Friday
	<u>July 10</u> 7:30-9:30 Rounds 9:30-12:30 Complete notes from Friday 7/8. Follow up on tests, email, FMLA	Follow regular schedule from July 11 to September 1, 2017			
Total Hours	5				

Mattie's 20hr Schedule*

	Mondays	Tuesdays	Wednesdays	Thursdays	Fridays
	7:30-9:30 Rounds 9:30-12:30 -MD inbasket (test results, Pt questions, Pt FMLA) -15min break	Clinic 1200-5:00 6 patients 1. 12 2. 12:45 3. 1:30 4. 2:15 5. 3 6. 3:45 -15min break to be built in to template so Pt times may adjust slightly. I will keep you updated.	7:30-9:30 Rounds 9:30-1230 -Complete notes and follow ups from Tues clinic. -weekly 1 hour meeting with Dr. Tirschwell -15min break	Off	11:30-2:30 -Possible clinic TBD by Tricia and Dr. Tirschwell -11:30 -12:15 -1:00 If no clinic patients then... -MD inbasket (test results, Pt questions, FMLA) -15min break 2:30-4:30 Friday Case Conference
Total Hours	5	5	5	0	5

*Schedule may change to fit the needs of the department